Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Telecommunications Relay Services	)	CG Docket No. 03-123
and Speech-to-Speech Services for	)	
Individuals with Hearing and Speech	)	
Disabilities	)	
	)	
Access to Emergency Services	)	

JOINT REPLY COMMENTS OF THE TEXAS 9-1-1 ALLIANCE AND THE TEXAS COMMISSION ON STATE EMERGENCY COMMUNICATIONS

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On the reply comments:

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March 8, 2006

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The Texas 9-1-1 Alliance[1] and the Texas Commission on State Emergency Communications[2] (collectively referred to herein as the "Texas 9-1-1 Entities") respectfully submit these joint reply comments to the Federal Communications Commission ("Commission" or "FCC") November 30, 2005, Notice of Proposed Rulemaking ("NPRM")[3] in the above-referenced docket concerning access to emergency services for Internet Protocol ("IP") Relay and Video Relay Services ("VRS").[4] The Texas 9-1-1 Entities recognize that others have been more actively involved with these important issues to date. The primary purpose of these reply comments is to offer comments from a 9-1-1 specific perspective that may potentially be helpful to the FCC and other interested parties in addressing issues associated with the goals of delivering needed emergency services to users of IP Relay and VRS.

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[1] The Texas 9-1-1 Alliance is an interlocal cooperation act entity composed of the Texas Health and Safety Code Chapter 772 Emergency Communication Districts with E9-1-1 service public safety responsibility for approximately 50% of the population of Texas. The Texas 9-1-1 Alliance members joining in these comments are: Abilene/Taylor County 9-1-1 District, Austin County Emergency Communications District, Bexar Metro 9-1-1 Network District, Brazos County Emergency Communication District, Calhoun County E9-1-1 Emergency Communication District, Cameron County Emergency Communications District, 9-1-1 Network of East Texas, Denco Area 9-1-1 District, Emergency Communications District of Ector County, Galveston County Emergency Communication District, Greater Harris County 9-1-1 Emergency Network, Henderson County 9-1-1 Communication District, Howard County 9-1-1 Communication District, Kerr Emergency 9-1-1 Network, Lubbock Emergency Communication District, McLennan County 9-1-1 Emergency Assistance District, Midland Emergency Communications District, Montgomery County Emergency Communication District, Potter-Randall County Emergency Communications District, Smith County 9-1-1 Communications District, Tarrant County 9-1-1 District, Texas Eastern 9-1-1 Network, and Wichita-Wilbarger 9-1-1 District.

[2] The Texas Commission on State Emergency Communications is a state agency created pursuant to Texas Health and Safety Code Chapter 771, and is the state of Texas' authority via statute for 9-1-1 emergency communications.

[3] *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Notice of Proposed Rulemaking, FCC 05-196 (rel. Nov. 30, 2005).

[4] The Texas 9-1-1 Alliance and the Texas Commission on State Emergency Communications did not file initial comments.

I.
Summary of Reply Comments

The Texas 9-1-1 Entities support FCC leadership and coordinated action concerning access to emergency services for IP Relay and VRS. The Texas 9-1-1 Entities respectfully urge the Commission to carefully consider how best to facilitate long-term solutions that exploit the capability of an advanced E9-1-1 infrastructure as it evolves because it may be the optimal long-term solution. As far as short-term and intermediate-term solutions, to the extent determined to be helpful, a Texas 9-1-1 Entity would volunteer to participate in first office applications and/or pre-deployment trials to assist in clarifying the record and deciding IP Relay and VRS 9-1-1 issues for the short-term and intermediate-term. To the extent that solutions that may be mandated by the FCC or adopted voluntarily by the industry to address these important issues may necessitate changes at the PSAP as far as training, standards, infrastructure, and equipment, the Texas 9-1-1 Entities urge the FCC and industry to communicate to PSAPs what may be needed in advance to facilitate what may need to be done within areas of PSAP responsibility.

II.
Reply Points

Reply Point No. 1: Integrating IP Relay and VRS into the migration of E9-1-1 services toward a Next Generation Internet Protocol E9-1-1 network may be the optimal long-term solution and FCC leadership and coordination would be helpful on these issues.

In initial comments, Telecommunications for the Deaf ("TDI"), while not taking a position at this time on the registration of VRS and IP Relay users as an interim solution, urged that it "would like to see registration replaced by automatic location information ('ALI') that does not rely upon registration once non-registration ALI is developed for

Voice over Internet Protocol ('VoIP')."[5] Similarly, the Rehabilitation Engineering Research Center on Telecommunications Access ("RERC-TA") urged that "[i]n addition to a short-term solution to 9-1-1 access through VRS and IP-enabled relay services, approaches must concurrently be developed for longer term solutions that exploit the capability of advanced E9-1-1 infrastructure as it evolves over the next five to ten years."[6] The Texas 9-1-1 Entities support the TDI and RERC-TA recommendations for Next Generation E9-1-1 long-term solutions. The Texas 9-1-1 Entities would emphasize the importance of FCC efforts to integrate IP Relay and VRS (as well as existing Telecommunications Relay Services ["TRS"]) into the migration of E9-1-1 services toward a Next Generation IP E9-1-1 network. In addition, the FCC's Network Reliability and Interoperability Council ("NRIC") 1B working group, has discussed backward compatibility for analog Text Telephone devices ("TTY") in an IP E9-1-1 network, standardization of IP-text formats, and sending both callback number for the user and the relay call center as related issues that need to be addressed and that would benefit by FCC leadership. Similarly, RERC-TA initial comments mention other important issues in this regard as well.[7] The Texas 9-1-1 Entities support and urge FCC leadership and coordinated action on long-term issues and solutions.

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[5] TDI Initial Comments at pp. 1-2.

[6] RECA-TA Initial Comments at p. 3.

[7] See RERC-TA Initial Comments at pp. 3-4: ("The Commission needs to immediately address not only 9-1-1 access through relay services, but also direct access to 9-1-1 via text. The FCC is the only agency with the expertise and mandate to address how text access can be migrated forward from the PSTN into IP so that text users can call 9-1-1 without the use of a relay service if they choose."); ("At the same time, an IP text successor to TTY is needed to ensure reliable and interoperable text communication on IP networks where TTY is not reliable and where no one wants to perpetuate TTY into the future.").

Reply Point No. 2: The initial comments appear mixed on the short-term and intermediate-term benefits and technical feasibility of direct connection to the dedicated wireline E9-1-1 network consistent with the VoIP interim (i2 type) architecture. To the extent determined to be helpful, a Texas 9-1-1 Entity would volunteer to participate in first office applications and/or pre-deployment trials if such would be helpful in clarifying the record and deciding these issues for the short-term and intermediate-term.

Some of the initial comments noted that IP Relay and VRS should not use the ten digit telephone numbers at the PSAP, but should instead use the existing wireline E9-1-1 infrastructure.[8] Some of the other initial comments indicated that the wireline E9-1-1 infrastructure not be used at the present time.[9] Some of the initial comments also debated the "registration" issue separate and apart from the use the dedicated wireline E9-1-1 network issue.

Sorenson Communications Inc. ("Sorenson") suggested that based on its experience implementation of any new 9-1-1 rules should take place in phases: Phase

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[8] Comments of the New Jersey Division of the Ratepayer Advocate at p. 8 ("Absent compelling information from the industry to the contrary, the Ratepayer Advocate supports the adoption of a prohibition on the use of administrative numbers by VRS and IP Relay providers that currently exists for VoIP providers."); see also, RERC-TA Initial Comments at p. 7 ("For example, dialing into a ten-digit administrative number is still allowed in TRS but has been dismissed as inadequate for voice customers in the interconnected-VoIP order. To the extent technically feasible, and even if it involves new expenditure of funds to make it happen, the timelines and standards should be equitable for direct text access, relay service access, and voice access to 9-1-1.")

[9] TDI Initial Comments at p. 2 ("Concerning the use of the existing wireline 911 infrastructure, the relatively small volume of VRS and IP Relay 911 calls does not necessitate direct service provider trunking to all PSAPs throughout the United States. This would be highly burdensome and costly to the TRS Fund, and would disproportionately affect the end users of these services."); Comments of Communications Access Center for the Deaf and Hard of Hearing on the Notice for Proposed Rule Making at p. 10 ("The Commission implemented certain rules for VOIP providers and restricted their ability to route calls to ten digit PSAP telephone numbers. CACDHH believes that there is a difference between VOIP providers 'routing' E911 calls to a ten digit number and a CA placing or dialing a call to a ten digit number. VRS and IP Relay providers must contact a PSAP by a voice telephone call and as such have no other way to reach the correct PSAP without dialing the appropriate ten digit number. Therefore, we believe that this position of the VOIP rules should not be implemented for VRS and IP Relay providers."); see also, Comments of Verizon at p. 5, Comments of Hamilton Relay, Inc. at p. 4, Comments of Sprint Nextel Corp. at pp. 6-8.

One – ensuring priority access for all 9-1-1 calls; Phase Two – matching the user with the appropriate PSAP; and Phase Three – adding location provisioning and native routing.[10] Sorenson indicates that Phase Three capabilities do not currently exist and that it will take at least one more year before it and its third-party vendor can develop and complete Phase Three.[11]

The Texas 9-1-1 Entities respectfully submit that the answer to the use of the dedicated wireline E9-1-1 network in the short-term and intermediate-term may depend on what additional benefits can be provided and whether technical interface issues have actually been solved. The Texas 9-1-1 Entities do not know for certain at the present time whether the interim (i2 type) E9-1-1 solution currently used for VoIP can be readily integrated and used for IP Relay and VRS services today. To the extent that industry members or the FCC need PSAPs to volunteer for first office applications or pre-deployment trials to determine the specific additional benefits and what is technically feasible, a Texas 9-1-1 Entity would volunteer to participate if requested and deemed helpful in deciding these issues for the short-term and intermediate-term.

Reply Point No. 3: PSAPs should be notified of any new expectations in advance so that they can address any needed training, standards, infrastructure, and equipment needs at the PSAP for short-term, intermediate-term, and long-term solutions.

As far as the dedicated wireline E9-1-1 network and infrastructure, PSAPs currently receive 9-1-1 emergency calls from people with hearing or speech disabilities via the PSTN from analog TTYs. The initial comments make clear that people with hearing or speech disabilities are readily moving from the PSTN to newer IP devices –

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[10] Comments of Sorenson Communications, Inc. at p. 2.

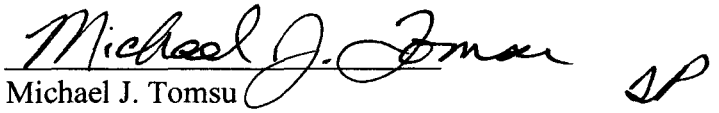
[11] Id. at pp. 6 and 12.

notwithstanding E9-1-1 limitations. The short-term, intermediate-term, and long-term solutions that may be mandated by the FCC or adopted voluntarily by the industry to address these important issues may necessitate changes at the PSAP as far as training, standards, infrastructure, and equipment. While the VoIP (i2 type) solution relies much on existing wireless E9-1-1 infrastructure at the dedicated wireline E9-1-1 network and the PSAP, it appears that short-term, intermediate-term, and long-term solutions for IP Relay and VRS as proposed in the NPRM and in initial comments could necessitate additional work at the PSAP level. To the extent changes need to be made at the PSAP level, the Texas 9-1-1 Entities urge the FCC and industry to communicate what may be needed in advance to facilitate what may need to be done by PSAPs for deployment of these solutions.

III.
Conclusion

The Texas 9-1-1 Entities appreciate the opportunity to comment on these important issues. The Texas 9-1-1 Entities respectfully urge FCC action consistent with these reply comments.

Respectfully submitted,



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